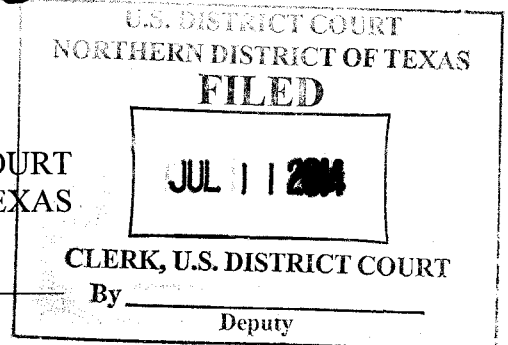


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

CARLOS PLAZOLA-RODRIGUEZ (3)

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No. 4-14-CR-0112-A

FACTUAL RESUME

INDICTMENT: Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance (cocaine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

MAXIMUM PENALTY:

\$1,000,000 fine and not more than twenty (20) years imprisonment, plus a term of supervised release of not less than 3 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the indictment are as follows:


- First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the indictment;
- Second: That the defendant knew of the unlawful purpose of the agreement;
- Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.


STIPULATED FACTS:

Beginning before June 1, 2012, and continuing until on or about November 14, 2012, in the Fort Worth Division of the Northern District of Texas, and elsewhere, the defendant, Carlos Plazola-Rodriguez, along with Ignacio Salcido, Sergio Salcido Aragon, and others did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

During the course of the conspiracy, the defendant, along with Ignacio Salcido and Sergio Salcido Aragon, conspired to sell cocaine to a confidential source. On June 8, 2012, the defendant, his co-conspirators and the confidential source met to discuss the sale of ten kilograms of cocaine. On November 14, 2012, the ten kilograms were delivered to a business in Euless, Texas. Later that same day, Ignacio Salcido was arrested with the ten kilograms of cocaine.

SIGNED this 27th day of June, 2014.


CARLOS PLAZOLA-RODRIGUEZ
Defendant


ANGELA SAAD
Counsel for Defendant